

IN THE DRAWINGS

The attached sheet of drawings includes changes to Fig. 2. This sheet, which includes Fig. 2, replaces the original sheet including Fig. 2.

Attachment: Replacement Sheet

REMARKS/ARGUMENTS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 1-29 are presently active in this case, Claims 18, 20, 22, 24 and 25 are amended by way of the present amendment.

In the outstanding Official Action Claim 25 was objected to for lacking antecedent basis; Claims 1-2, 4-5, 23 and 26-29 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,517,294 to Ogiri et al.; Claims 3 and 25 were rejected under 35 U.S.C. § 103(a) as unpatentable over Ogiri et al. in view of Japanese patent number 11-249514A to Kubota; and Claims 6-22 and 24 were indicated as being allowable if rewritten in independent form including all of the limitation of the base claim and any intervening claims.

First, Applicants wish to thank Examiner Grainger for the indication of allowable subject matter in Claims 6-22 and 24. Applicants note that these claims were also indicated as allowable in the first action on the merits mailed August 16, 2004. Applicants have now amended Claims 18, 22, and 24 to include the limitations of their base claim as originally filed in this application. Thus, Claims 18, 22, and 24 are in condition for allowance. However, Applicants also maintain Claims 1, 23, 26 and 27 in their form as filed in the February 16, 2005 amendment because Applicants believe that these claims patentably define over the cited references for the reasons discussed below.

With regard to the objection to the drawings, Figure 2 has been amended to include the legend "Background Art." Therefore, the objection to the drawings is believed to be overcome.

With regard to the rejection under 35 U.S.C. § 112, second paragraph, Applicants have amended Claim 25 to correct the informality noted in the outstanding Official Action. Therefore, Claim 25 now provides proper antecedent basis in compliance with 35 U.S.C. §

112, second paragraph. Moreover, Applicants have amended Claims 20 and 21 to correct discovered informalities.

Turning now the merits, Applicants invention is directed to a cleaning member of an image forming apparatus. As discussed in the background section of Applicants' specification, in a conventional image forming apparatus, a cleaning member is used to remove excess developer from an image carrier, for example. The cleaning member is attached to a case of the image forming apparatus and includes an elastic blade that is connected to a support plate having an attaching portion that is fixed to the case of the apparatus such that the elastic blade contacts the image carrier. However, the present inventors have recognized that such conventional cleaning members are problematic in that they cause noise during cleaning, and/or are inefficient in providing such cleaning. Applicants' invention is directed to addressing these problems.

Specifically, Applicants' independent Claims 1, 26 and 27 recite a cleaning member for cleaning an image carrier, the cleaning member including a support plate having a planar face portion configured to be fixed to an object in a position adjacent to the image carrier, a fold portion forming a plane that extends at an angle to the planar face portion and a reinforcement feature configured to reinforce the strength of the support plate and coupled to the planar face portion. Also recited is a blade connecting portion coupled to the planar face portion and an elastic blade member that is connected to the blade connecting portion of the support plate such that the elastic blade extends toward the image carrier when the support plate is fixed to the object.

To establish a *prima facie* case of anticipation under 35 U.S.C. § 102, a single prior art reference must describe each and every element as set forth in the subject claim.<sup>1</sup> “the

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<sup>1</sup> *Verdegal Bros. V. Union Oil Co. of California*, 814F2d 628, 631, 2USPQ2D 1051, 1053 (Fed. Cir. 1987).

identical invention must be shown in as complete detail as is contained in the . . . claim.”<sup>2</sup>

Moreover, as required by MPEP 2143.03, “All words in the claim must be considered in judging the patentability of the claim against the prior art.” Applicants respectfully submit that the cited reference to Ogiri et al. fails to teach each and every limitation of independent Claim 1, 26, or 27.

The cited reference to Ogiri et al. discloses an image forming machine having a cleaning means 12. As shown in Figure 2 of Ogiri et al., the cleaning means includes a support member 28 having hanging portions 32 and 34. Connected to the support member 28 is a separate blade holding member 44 bent at a right angle to form first and second legs 46 and 48 respectively. As seen in Figure 2, first leg 46 is bolted to the image forming apparatus while the second leg 48, at a right angle to the first leg, includes an elastic cleaning blade 68 attached thereto, and extending to clean the drum 10. As discussed in the amendment filed February 16, 2005, the cleaning member of Ogiri et al. does not include a reinforcement feature on a planar face of the support plate. In response to this, the outstanding Official Action takes the position that items 36, 38, 96A, 100A, 96B, and 100B in Figure 2 of Ogiri et al. meet the limitation of a reinforcement feature. However, each of these items is a feature that is separate from and not a portion of the blade holding member 44 and therefore cannot meet the claimed limitation of the reinforcement feature.

Specifically, as noted above, Claims 1, 26 and 27 recite that the support plate *comprises* a planar face portion, a fold portion and a reinforcement feature arranged on the planar face portion. Thus, the reinforcement feature is *part of* the support plate. The Official Action cites item 48, which is part of the blade holding member 44, as the claimed support plate. However, items 36 and 38 are support blocks of the image forming cartridge itself, and items 96A, 96B, and 10A, 10B are tabs that couple the support member 28 to the blade

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<sup>2</sup> Richardson v. Suzuki Motor, Co., 868F2d 1226, 1236, 9USPQ2D 1913, 1920 (Fed. Cir. 1989).

holding member 44. That is, the items recited as the reinforcement feature in the Official Action are not part of the blade holding member, which is cited in the Official Action as corresponding to the support plate. Thus, items 36, 38, 96A, 96B, 10A and 10B cannot meet the limitation of the reinforcement feature.

Even assuming that Ogiri et al. disclosed the claimed reinforcement feature, this reference also does not disclose the claimed fold portion of the support plate. As noted above, the Official Action cites the blade holding member 44 as reading on the claimed support plate. This item simply does not include a fold portion. Applicants note that the Official Action is *completely silent* with respect to the fold portion. Moreover, to the extent that the Official Action may consider the second leg 48 the fold portion, Applicants note that the blade holding member 44 would then not have a blade connecting portion. Thus, Applicants respectfully submit that the outstanding Official Action fails to establish a *prima facie* case of anticipation of Claims 1, 26 and 27 based on Ogiri et al.

Regarding the rejection of Claims 3 and 25 under 35 U.S.C. § 103(a) as being unpatentable over Ogiri et al. in view of Kubota, Applicants note that this rejection relies on Ogiri et al. for teaching all of the limitations of Claim 1, and cites Kubota as teaching only a cleaning blade in a process cartridge. As Ogiri et al. fails to teach all the limitations of Claims 1, 26 and 27 as discussed above, the Official Action also fails to make a *prima facie* case that Claims 3 and 25 are obvious in view of Ogiri et al. and Kubota.

With regard to Claim 23, this claim recites a means arranged on the plane of the support plate for reinforcing a strength of the support plate. Thus, Claim 23 includes a mean-plus-function limitation that must be interpreted under 112, sixth paragraph, to include the structure disclosed in the specification for performing the recited function and equivalents thereof. As described in Applicants' specification, several configurations of the reinforcing portion 67 on the planar face of the support plate perform the reinforcing function. Ogiri et

al. does not teach any structure that meets reinforcing features disclosed in the specification.

Therefore, Claim 23 also patentably defines over the cited references.

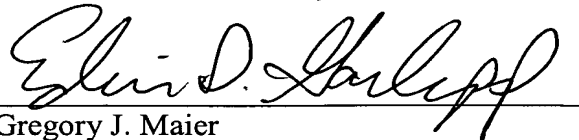
Thus, Claims 1, 23, 26 and 27 patentably define over the cited references. Moreover, as the remaining depending claims depend from one of these independent claims, these pending dependent claims also patentably define over the cited references.

Consequently, in view of the present amendment, no further issues are believed to be outstanding in the present application and the present application is believed to be in condition for formal allowance. An early and favorable action is therefore respectfully requested.

Finally, Applicants note that because the Official Action failed to present a *prima facie* case of anticipation or obviousness, any forthcoming Official Action must introduce a new grounds of rejection. Moreover, as the amendments herein merely places allowable claims in independent form, these amended claims include "limitations which should reasonably have been expected to be claimed" and any forthcoming Official Action cannot be necessitated by amendment. Thus any forthcoming Official Action cannot be made final.

Respectfully submitted,

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